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11/16/2018

RE:

E-rate Program: CC Docket No. 02-6
USAC Appeal # 127091
Applicant Name: Community of Peace Academy
Applicant BEN: 63651
Vendor Name: Willard Network Technologies, LLC
Vendor SPIN: 143031940
FRN: 1799048893
Invoice Number: 2826382
Remittance Statement: 443009909
Line ID: 9227983

Hello,

We are appealing the decision of USAC Appeal # 127091; that on Invoice #2826382 Line 9227983 contained ineligible services and therefore reimbursement was denied.

We have been informed by a Revised Funding Commitment Decision Letter that our appeal was denied because:

“Your SLD Invoice included costs for the following ineligible products and/or services: Basic Maintenance of a DNS Server. FCC rules provide that funding may be approved only for eligible products and/or services (47 C.F.R. §§ 54.502, 54.503). The USAC web site at <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>, includes a list of eligible products and/or services. It has been determined through our review of your appeal that the requested amount was appropriately disallowed for ineligible products/services.”

We were informed by USAC Customer Service Case #250718 that the line was denied because:

“*Per invoice management, On Invoice #2826382 Line 9227983, the DNS Server being Maintained is Ineligible according to program rules and therefore the Maintenance charges are also ineligible.”

However, as the invoice from the vendor states:

"Logged into the SW-B361-CPA and made small changes to the vLAN configuration to allow access to the internal DNS servers from all the vLANs" and "Confirmed vLAN setting on SW-B361-CPA did not create a security issue. Made sure that the DNS servers from specific vLANs were the only internal servers accessible from those vLANs."

We contend that the invoice should not have been denied because of the following:

1. The vendor did NOT perform maintenance on the DNS Server. The maintenance was performed on the single switch identified on the invoice.
2. SW-B361-CPA is the name of the switch the vendor was working on.
3. The vendor made changes to the configuration of the switch (vLAN configuration & settings), not the DNS Server.
4. The vendor then tested and confirmed those new switch configuration changes did not create security problems.
5. Page 11 of the 2017 Eligible Services List states that Switches are eligible for funding.
6. Page 12 of the 2017 Eligible Services List states that configuration changes, of eligible equipment, are eligible for funding.

Please find attached:

1. A copy of the Revised Funding Commitment Decision Letter.
2. A copy of the invoice from the service provider.
3. An explanation from USAC as to why the line was originally denied.
4. A copy of the 2017 Eligible Services List - DA-16-1023A1
5. A copy of the Form 472 (BEAR) Notification Letter.
6. A copy of the E-Rate Program Remittance Statement.

Thank you,



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